

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) NORRIS, McLAUGHLIN & MARCUS, PA Counsel for the Debtor/Debtor-in-Possession 400 Crossing Blvd., 8 th Floor P.O. Box 5933 Bridgewater, NJ 08807-5933 (908) 722-0700	Chapter 11 Case No. 15-14558 (VFP) Judge: Hon. Vincent F. Papalia
In Re: 190 SOUTH STREET REALTY HOLDINGS, L.P., Debtor.	

**NOTICE OF MOTION OF 190 SOUTH STREET RELATY HOLDINGS, L.P. FOR THE
ENTRY OF AN ORDER AUTHORIZING THE DEBTOR-IN-POSSESSION TO SELL
PROPERTY FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND
INTERESTS PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE AND
OTHER RELATED RELIEF**

PLEASE TAKE NOTICE that *on the date specified in the Order Shortening Time*, in the forenoon, or as soon thereafter as counsel may be heard, 190 South Street Realty Holdings, L.P. (the “Debtor”) shall move before the Honorable Vincent F. Papalia, at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King Jr. Courthouse, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, Courtroom 3B, for the entry of an order authorizing the debtor-in-possession to sell property free and clear of liens, claims, encumbrances and interests pursuant to section 363 of the Bankruptcy Code and other related relief (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the Debtor shall rely upon the Certification of Lawrence S. Berger, Memorandum of Law, and proposed Order filed simultaneously herewith in support of the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed in accordance with the applicable rules of this Court and the ***Order Shortening Time***.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

Respectfully Submitted,

NORRIS McLAUGHLIN & MARCUS, P.A.
Counsel to the Debtor/Debtor-in-Possession

Dated: September 12, 2017

By: /s/ Morris S. Bauer
Morris S. Bauer, Esq.